

353 NORTH CLARK STREET, CHICAGO, ILLINOIS 60654-3456

JENNER & BLOCK LLP

MEMORANDUM ENDORSED

October 23, 2023

Terri L. Mascherin
Tel +1 312 923 2799
TMascherin@jenner.com

VIA ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *Schansman, et al., v. VTB Bank of Russia PJSC, et al.*, No. 19-cv-02985-ALC-GWG
(S.D.N.Y.) – Plaintiffs’ Letter Motion to File Under Seal Plaintiffs’ Response to VTB
Bank PJSC’s October 12, 2023 Status Report**

Dear Judge Gorenstein:

Pursuant to Federal Rule of Civil Procedure 26(c) and Your Honor’s Individual Rule 2.E, Plaintiffs respectfully move the Court for leave to file under seal the unredacted version of Plaintiffs’ Response to VTB Bank PJSC’s (“VTB”) and Exhibit A. In support of this motion, Plaintiffs state as follows:

1. The above-listed filing contains references to material that VTB has designated as confidential pursuant to the Protective Order in this case. ECF No. 294. Accordingly, pursuant to the Protective Order, *id.*, Plaintiffs have provisionally filed the above listed filing under seal.
2. VTB has designated information contained in the filing as confidential. Under the Protective Order, Plaintiffs are required to file these materials under seal in any court filing. ECF No. 294 ¶ 13. Under Your Honor’s Individual Rule 2.E, when “the request to seal arises because of an opposing party’s designations, the opposing party has the obligation to make the written application to the Court justifying the proposed sealing.”

Plaintiffs respectfully request that the Court determine whether to grant leave to file the above listed filing under seal following VTB’s written application.

October 23, 2023

Page 2

Sincerely,

/s/ Terri L. Mascherin

Terri L. Mascherin (admitted *pro hac vice*)

Lee Wolosky

Jason P. Hipp


JENNER & BLOCK LLP

Counsel for Plaintiffs

cc: Counsel of Record (via ECF)

VTB is directed to make the written application to seal on or before October 30, 2023. In the absence of a timely-filed application, plaintiffs shall file the unredacted version.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge
October 24, 2023